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## Supreme Court Rejects NCAA Athlete Compensation Restraints

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Last month, the United States Supreme Court unanimously held that the National Collegiate Athletic Association's restrictions on education-related compensation for student-athletes violated Section 1 of the Sherman Antitrust Act (the "Sherman Act"). *National Collegiate Athletic Association v. Alston*, 2021 WL 2519036 (U.S. June 21, 2021). The Justices concluded that the district court properly utilized and applied the more in-depth rule of reason approach to condemn limits on undergraduate athletic scholarships and other athletic performance-related compensation. This unanimous opinion stands in contrast to many antitrust decisions that have been closely split in recent years.